

1 KRISTIN K. MAYES
2 Attorney General of Arizona
3 (Firm State Bar No. 14000)
4 John Raymond Dillon IV (AZ No. 036796)
5 Sarah Pelton (AZ Bar No. 039633)
6 Alyse C. Meislik (AZ Bar No. 024052)
7 Dylan Jones (AZ Bar No. 034185)
8 Office of the Arizona Attorney General
9 2005 North Central Avenue
10 Phoenix, AZ 85004
11 Phone: (602) 542-3725
12 Fax: (602) 542-4377
13 consumer@azag.gov
14 *Counsel for Plaintiff State of Arizona*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF ARIZONA**
14

15 State of Arizona, *ex rel.* Kristin K. Mayes,
16 Attorney General, *et al.*,

17 Plaintiffs,

18 v.

19 Michael D. Lansky, L.L.C., dba Avid
20 Telecom, *et al.*,

21 Defendants.
22
23
24
25
26
27
28

Case No.: 4:23-cv-00233-TUC-CKJ

**PLAINTIFFS' RESPONSIVE BRIEF
ON DISCOVERY DISPUTES**

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Defendants’ Opening Brief outlined several concerns regarding Plaintiffs’ objections to Defendants’ First Requests for Production (“RFPs”), Defendants’ First Requests for Admissions (“RFAs”) and Plaintiffs’ Responses to Defendants’ Rule 30(b)(6) defective deposition notices. Plaintiffs submit this Responsive Brief and in turn note: (1) Plaintiffs met and conferred with defense counsel in good faith, fully prepared to address all issues of concern to Defendants; (2) Plaintiffs have not withheld any non-privileged responsive documents despite their good faith objections; (3) Defendants’ 30(b)(6) deposition notices were facially defective; (4) the record shows Plaintiffs consistently indicated a willingness to meet and confer on issues of Defendants’ concern; and (5) Plaintiffs’ Responses to Defendants’ RFAs are true and issued in good faith.

II. ARGUMENT

a. Defendants’ Brief Relies on Misrepresentations and Procedurally Deficient, Inadmissible Evidence.

Defendants’ Opening Brief is predicated on the false claim that Plaintiffs have obstructed discovery, by imposing “direct and indirect barriers to all forms of discovery sought by Defendants” and preventing “the pursuit of a meaningful direct meet and confer process.” In support, Defendants rely on the unsigned and self-serving Declaration of Greg Taylor, which – without any documentary evidence – asserts that during the parties’ July 15, 2025 telephonic meet and confer, Plaintiffs’ counsel prevented him from offering substantive input, refused to engage on any substantive issues, failed to provide any substantive responses, and engaged in “overspeaking” for approximately 20 minutes until he was forced to unilaterally terminate the call. *See, e.g.*, Dkt #138-1.

In reality, the July 15, 2025 meet-and-confer lasted for more than 40 minutes, during which Plaintiffs’ counsel substantively addressed Defendants’ perceived issues with Plaintiffs’ responses to Defendants’ Rule 30(b)(6) deposition notices, Defendants’ RFPs and Defendants’ RFAs. *See* Declaration of Sarah Pelton, dated September 8, 2025

(“Decl.”) at ¶ 6, Exs. II-JJ. At no point did Plaintiffs’ counsel refuse to engage, decline to provide substantive responses or engage in any “abusive” behavior. *Id.* at Ex. JJ. Rather it was defense counsel who appeared unprepared, having failed to provide the promised outline of Defendants’ disputed issues in advance of the meet-and-confer. *Id.* And when pressed for factual or legal support for the few positions he did articulate, defense counsel had none. Defendants’ mischaracterization of the parties’ meet-and-confer only underscore the lack of a good-faith basis for their discovery positions.

b. In Addition to being Factually Inaccurate, the Declaration of Greg Taylor is Procedurally Defective.

Under Rule 11(a) of the Federal Rules of Civil Procedure, every paper filed with the Court must be signed by at least one attorney of record in the attorney's name. An unsigned declaration is a nullity and must be stricken unless promptly corrected. *See* Fed. R. Civ. P. 11(a). On September 3, 2025, Plaintiffs alerted defense counsel to the deficient, unsigned Declaration of Greg Taylor. *See* Decl. at ¶ 10, Ex. QQ. The following day, September 4, 2025, defense counsel acknowledged Plaintiffs’ notice and represented that a “substantive reply” would be forthcoming by close of business Friday, September 5, 2025. *Id.* at ¶ 11, Ex. RR. To date, however, defense counsel has neither corrected the deficiency in Mr. Taylor’s declaration, nor otherwise provided any “substantive reply”. *Id.* at ¶ 12. Because the Declaration of Greg Taylor remains unsigned and uncorrected, it must be stricken pursuant to Rule 11(a) and Local Rule 7.2(m)(2).¹

c. Defendants Mischaracterize Plaintiffs’ Responses and the Current Document Production.

i. Plaintiffs Provided Specific, Substantiated Objections to the Overbreadth and Vagueness of Certain Requests.

Defendants’ assertion that Plaintiffs “failed to provide specific evidence or reasoning to support” their objections to Requests Nos. 1-45, 48, and 51 is false. In each of their objections, Plaintiffs identified the overbroad term(s) and stated their reasoning.

¹ In the event defense counsel files a corrected, signed declaration repeating the same false allegations, Plaintiffs will seek appropriate relief under Rule 11(b) and Rule 11(c).

Frequently, Plaintiffs asserted concerns of overbreadth when Defendants used blanket, undefined terms that could be interpreted so broadly as to be burdensome to produce (i.e. “data” in Request No. 19 could refer to many, very different kinds of information). Plaintiffs also objected to Requests that failed to include a temporal limitation, e.g. Requests Nos. 1-23, 29-32, 45, 48, and 51. As yet another example, Plaintiffs objected as overbroad to Request No. 51 for all press releases made by each state law action state about any Defendant, as this publicly-available information is equally available and less expensive for Defendants to obtain without the need to issue a Request. *See* Fed. R. Civ. P. 26(b)(1) (contemplating the parties’ relative access to relevant information).

ii. Plaintiffs’ Relevance Objections are Well-Founded and Proffered in Good Faith.

First, Plaintiffs wish to establish that they have withheld no documents from production on the basis of their relevance objections to Requests Nos. 29-32, 43-45, 48, and 51. That being said, Plaintiffs stand behind their objections.

Defendants state that Requests Nos. 29-32 seek documents providing data regarding when the Called Party obtained the telephone number and whether from the predecessor owner of that telephone number consented to receive the calls at issue. The date on which the Called Party obtained the service for a particular number is irrelevant to whether the call violated the law on the date the call was made, as it is not an element or burden of proof for either party. Whether a predecessor owner of the telephone number gave consent to be called is also irrelevant. When the Called Party obtained the service is irrelevant to Defendants’ burden to show that the caller had consent to call when the call was made and received.²

Defendants’ Requests Nos. 43 and 44 seek information regarding Defendant Reeves’ relationship to Defendant Avid Telecom. Defendants claim it is “inconceivable” that Plaintiffs could have offered a relevance objection to these topics in good faith.

² The Called Party for the purpose of consent is the *current* subscriber of the telephone number, not the previous one. *See N.L. by Lemos v. Credit One Bank, N.A.*, 960 F.3d 1164, 1167-1172 (9th Cir. 2020) (defendant’s intent to call a customer who had previously consented to its calls did not exempt defendant from liability under the TCPA when it called someone else who did not consent).

1 Plaintiffs refute Defendants' statement that Defendant Reeves' liability is based entirely
 2 on her alleged status as an employee of Avid Telecom. Defendant Reeves' employment
 3 status is not dispositive of the larger issue of liability. Defendant Reeves is not relieved of
 4 liability if she is not found to be an employee of Defendant Avid Telecom. Defendant
 5 Reeves could also be individually responsible or liable under an agency theory by virtue of
 6 her personal participation in the acts and practices that violated federal and state rules and
 7 statutes.³ Defendants proffered no argument in their opening brief as to why Request 45 is
 8 relevant – Plaintiffs maintain it is not dispositive of any claim or defense.

9 Defendants argue that Requests Nos. 48 and 51 could be potential admissions
 10 against interest, including publications of fact contrary to allegations in the complaint.
 11 Plaintiffs would like to reiterate that press releases are, by their nature, publicly available.
 12 There is no claim by Plaintiffs or Defendants or counterclaim from Defendants that is
 13 relevant to the content of any press releases. Further, Plaintiffs produced the press releases
 14 despite having no obligation to produce publicly available materials, subject to the
 15 objection that the press releases are not relevant or necessarily admissible.

16 **iii. Plaintiffs Have No Duty to Provide Damage Calculations under**
 17 **the Federal Rules of Civil Procedure.**

18 Defendants state that Plaintiffs have an obligation to support their claims under Rule
 19 26(a)(1)(A)(iii), and further failed to make a timely disclosure of damages under Rule
 20 26(a)(1)(C). Plaintiffs' Complaint, in the Prayer for Relief section, as well as Plaintiffs'
 21 initial disclosures served September 6, 2024 set forth the remunerative relief sought for
 22 each category of damages for each count. *See* Plaintiffs' Initial Rule 26(a)(1) Disclosures
 23 at 34-36. The applicable statutory damages and civil penalties will be determined at trial
 24 as to the type and number of violations. The Plaintiffs have no obligation to undertake legal
 25 research or organize factual evidence for Defendants to provide a calculation of the
 26 respective potential statutory civil penalties that may be applicable for each count of
 27 Plaintiffs' Complaint. Additionally, many of the initial calculations cited in Plaintiffs'
 28

³ *See* Conformed Complaint at ¶¶ 404-416.

Complaint are based on a preliminary analysis of Defendants' call detail records which are equally, if not more readily available, to Defendants.

To be sure, even if Plaintiffs had a duty to provide greater detail on the disclosures of damages provided under Rule 26(a)(1)(iii), Defendants' timing is much too late as the Court required the exchange of initial disclosures on September 6, 2024. *See* Dkt. #84 at 3.

iv. Plaintiffs Do Not Need to Produce a Privilege Log.

Plaintiffs have not produced a privilege log because they have not withheld any documents on the basis of privilege that are required to be logged pursuant to Section F of the ESI Order [Dkt. #120]. Plaintiffs have objected to certain Requests on the basis of privilege, but no privilege log need be made pursuant to F(1)(e) of the ESI Order [Dkt. #120].

d. Defendants Served Facially Defective Rule 30(b)(6) Deposition Notices.

As to Defendants' Rule 30(b)(6) notices, Defendants' opening brief fails to address – let alone refute – the fact that the deposition notices served to 49 Plaintiffs were facially defective under Rules 30(b)(1) and 30(b)(6) of the Federal Rules of Civil Procedure. Rule 30(b)(1) requires the party seeking the deposition to specify the date and time of the 30(b)(6) deposition. *See* Fed. R. Civ. P. 30(b)(1) (“[T]he notice must state the time and place of the deposition, and, if known, the deponent’s name and address.”). Plaintiffs responded and objected to each Notice, as the Notices failed to specify the date and time of the 30(b)(6) deposition in violation of Rule 30(b)(1). For proper service, Rule 30(b)(6) requires the serving party to name as the deponent “a public or private corporation, a partnership, an association, a governmental agency, or other entity”. *See* Fed. R. Civ. P. 30(b)(6). Here, the Notices served to Plaintiffs failed to do so. Plaintiffs noted this in their individual Responses to Defendants' 30(b)(6) Notices. *See* Decl. at ¶ 4, Ex. GG.

Indeed, the Lead Plaintiff States and the eleven Plaintiff States that brought state law claims do not object to Rule 30(b)(6) depositions of properly identified, relevant topics that otherwise comport with Rules 26 and 30 of the Federal Rules of Civil Procedure and

1 other applicable state and federal laws. Rather, the Plaintiffs object to Defendants'
2 insistence that Plaintiffs designate witnesses in advance of the parties resolving disputes as
3 to the topics identified. As such, Plaintiffs need to know the nature and scope of the topics
4 subject to examination in order to designate the appropriate witnesses.

5 Plaintiffs' written objections, each labeled as "Response to Topic (-)," pertained to
6 the substance of the specific topics identified, not merely to the designation of a
7 knowledgeable witness. Decl. at Ex. GG. Further, Defendants' opening brief fails to
8 address or refute Plaintiffs' specific objections to each of the substantive topics identified,
9 namely, overbreadth. Many of Defendants' topics sought each AG's office to disclose
10 either the investigation it conducted that formed the basis for its complaint (i.e., attorney
11 work product) or discussions AG's offices had internally or with other law enforcement
12 agencies, which are privileged. These topics seem to support a malicious prosecution claim
13 Defendants have teased, although Defendants have not been brought the claim in any
14 defense or counterclaim. As such, these topics are irrelevant and not dispositive of the
15 claims at issue. Additionally, Defendants' topics are unduly burdensome, cumulative, and
16 seek oral testimony on topics that are more appropriately addressed using written discovery
17 as most of Plaintiffs' evidence are records obtained from third parties or will be supported
18 through expert witnesses. The ESI Order was entered after Plaintiffs' objections were
19 served and since that time, Plaintiffs have produced over 90,000 documents responsive to
20 Defendants' 685 RFPs that are relevant to the topics identified in the deposition notices.⁴
21 Plaintiffs' document production includes an index identifying the RFP to which the
22 documents are responsive. Plaintiffs' objections are valid, specific, and narrowly tailored
23 to the fundamental defects of Defendants' deposition topics. As relayed to Defendants in
24 May of 2025, Plaintiffs will designate appropriate witnesses upon agreement by the parties
25 as to the nature and scope of relevant topics that comport with Rule 26 and 30 of the Federal
26 Rules of Civil Procedure.

27
28

⁴ Plaintiffs' document production includes an index identifying the RFPs to which the documents are responsive.

Finally, Defendants claim Plaintiffs have refused to meet and confer on any of their objections. This is not so. As early as April 25, 2025, Lead States emailed defense counsel seeking to limit the topics in each Plaintiff State's Notice. Decl. at ¶ 3, Ex. FF. The Lead States never received a response and thus sent their written Objections to defense counsel. In each State's Objection document, Plaintiffs stated their willingness to meet and confer. Decl. at ¶ 4, Ex. GG. Furthermore, Plaintiffs engaged in a meet and confer on July 15, 2025, where defense counsel addressed Rule 30(b)(6) issues. Decl. at ¶ 6, Ex. II-JJ. When defense counsel sent their 139-page meet and confer letter after the July 15 meet and confer, Plaintiffs responded and reiterated their willingness to meet and confer on 30(b)(6) issues. Decl. at ¶ 7, Exs. KK-NN. Additionally, in Exhibit II of Defendants' Opening Brief, Defendants did not include the full email conversation to date. Two days after defense counsel sent the email in their Exhibit II to Plaintiffs, Plaintiffs responded in full. Decl. at ¶ 7, Ex. MM-NN. Plaintiffs see this as yet another one of Defendants' attempts to mischaracterize the record.

e. Plaintiffs' Responses to Defendants' RFAs are True, Supported, and Comply with the Federal Rules of Civil Procedure.

i. Plaintiffs Stand by Responses 5 and 6.

Defendants' First RFAs Nos. 5 and 6 relate to Plaintiffs' alleged communications with regulatory authorities about Defendant Avid Telecom's calls. Plaintiffs are without knowledge because Plaintiffs are not aware of the inner workings of every State agency within their respective jurisdictions and what actions those agencies may or may not have taken in regard to Defendants.

ii. Responses 18-20 are Clear and Address the Respective Requests.

Defendants' First RFAs Nos. 18-20 relate to the terms and conditions of YouMail, a third party telecommunications agency. Plaintiffs' Responses to Requests 18 and 20 direct Defendants to YouMail's Terms of Service and show that Plaintiffs have individual subscribers' permission to access those subscribers' recordings. Plaintiffs' Response to Request 19 is a complete admission that addresses Defendants' Request, that certain data

1 referenced in the Complaint involved calls placed to YouMail subscribers. Plaintiffs are
2 unsure how they are not addressing the “substance” of the Requests as Defendants so state.

3 **f. Plaintiffs’ Issued Discovery is Reasonable Given Defendants’ Repeated**
4 **Obstruction.**

5 Defendants’ flagrant abuse of their discovery obligations and persistent obstructive
6 tactics have caused significant delays in this case. Over the course of this litigation,
7 Plaintiffs issued only one set of discovery Requests for Production on each Defendant, to
8 which Plaintiffs are *still* awaiting meaningful responses that comport with Defendants’
9 obligations to participate in the litigation and defense counsel’s obligations to comply with
10 the Rules of Professional Conduct. To date, Plaintiffs have received approximately 320
11 documents from Defendant Reeves and no production at all from Defendant Avid Telecom
12 or Defendant Lansky. Decl. at ¶ 5, Ex. HH.

13 The Requests for Admission issued by Plaintiffs on August 25, 2025 are relevant to
14 claims addressed in the Complaint – the responses to which lie within Defendants’
15 knowledge. Defendants’ respective admissions are necessary noting their absence of
16 responsive production regarding Plaintiffs’ outstanding discovery requests. In light of the
17 lack of production from Defendants, asking Defendants to admit to facts they know to be
18 true about the business they conducted is squarely within Plaintiffs’ ability in a reciprocal
19 discovery process.

20 Defendants’ characterization of Plaintiffs’ actions as to “economically cripple
21 Defendants” is completely unfounded. Defense counsel chose to undertake representation
22 in a multistate litigation involving 49 Plaintiff States and a myriad of state and federal
23 statutes. To insist that Plaintiffs are attempting to make the discovery process more onerous
24 is yet another of defense counsel’s attempts to falsify the record and undermine Plaintiffs’
25 ability to prosecute their case. Tellingly, defense counsel omits the fact Defendants issued
26 hundreds of discovery requests on Plaintiffs in the last month – over 570 Requests for
27 Production in Defendants’ Second RFPs; the RFPs set forth in Defendants’ First and Third
28

RFPs and Defendant Reeves' First RFPs; and Defendants' First RFAs and Defendant Reeves' First RFAs.

In an effort to decrease Defendants' claimed burden, Plaintiffs emailed defense counsel on August 28, 2025 and offered to withdraw 84 Requests from Plaintiffs' First Set of RFAs issued to each Defendant if Defendants agreed to three stipulations. Decl. at ¶ 8, Exs. OO-PP. No Defendant has yet responded to this offer. Decl. at ¶ 9.

III. CONCLUSION

For the reasons set out above and in Plaintiffs' Opening Brief on Discovery Disputes [Dkt. #134], Plaintiffs respectfully request judicial relief to overcome Defendants' flagrant abuse and contempt of the discovery process to date, including leave to file motions to compel and the appointment of a magistrate to ensure Defendants' compliance with their discovery obligations going forward.

RESPECTFULLY SUBMITTED this 8th day of September 2025.

FOR THE STATE OF ARIZONA:

KRISTIN K. MAYES
Attorney General for the State of Arizona

/s/ John Raymond Dillon IV
JOHN RAYMOND DILLON IV
SARAH PELTON
Assistant Attorneys General
Attorneys for the State of Arizona

FOR THE STATE OF INDIANA:

TODD ROKITA
Attorney General for the State of Indiana

/s/ Douglas S. Swetnam
DOUGLAS S. SWETNAM
THOMAS L. MARTINDALE
Deputy Attorneys General
Attorneys for the State of Indiana

**FOR THE STATE OF NORTH
CAROLINA:**

JEFF JACKSON
Attorney General for the State of North
Carolina

/s/ Tracy Nayer
TRACY NAYER
ROCHELLE SPARKO
Special Deputy Attorneys General
Attorneys for the State of North Carolina

FOR THE STATE OF OHIO:

DAVE YOST
Attorney General for the State of Ohio

/s/ Erin Leahy
ERIN B. LEAHY
Senior Assistant Attorney General
Attorney for the State of Ohio

Lead Counsel for Plaintiffs

LIST OF PLAINTIFFS' COUNSEL

John Raymond Dillon IV (AZ Bar
No. 036796)

Sarah Pelton (AZ Bar No. 039633)
Assistant Attorneys General
Arizona Attorney General's Office
2005 North Central Avenue

Phoenix, AZ 85004

Phone: (602) 542-8018

Fax: (602) 542-4377

john.dillonIV@azag.gov

sarah.pelton@azag.gov

Attorneys for Plaintiff State of Arizona

Tracy Nayer (NC Bar No. 36964)

Rochelle Sparko (NC Bar No. 38528)

Special Deputy Attorneys General

North Carolina Department of Justice

Consumer Protection Division

P.O. Box 629

Raleigh, North Carolina 27602

Phone: (919) 716-6000

Fax: (919) 716-6050

tnayer@ncdoj.gov

rsparko@ncdoj.gov

*Attorneys for Plaintiff State of North
Carolina*

Douglas S. Swetnam (IN Bar No. 15860-
49)

Thomas L. Martindale (IN Bar No. 29706-
64)

Deputy Attorneys General

Office of the Indiana Attorney General

Todd Rokita

Indiana Govt. Center South, 5th Fl.

302 W. Washington St.

Indianapolis, IN 46204-2770

Phone: (317) 232-6294 (Swetnam)

(317) 232-7751 (Martindale)

Fax: (317) 232-7979

douglas.swetnam@atg.in.gov

thomas.martindale@atg.in.gov

Attorneys for Plaintiff State of Indiana

Erin B. Leahy (OH Bar No. 0069509)

Senior Assistant Attorney General

Office of Attorney General Dave Yost

30 East Broad Street, 14th Fl.

Columbus, OH 43215

Phone: (614) 752-4730

Fax: (866) 768-2648

Erin.Leahy@OhioAGO.gov

Attorney for Plaintiff State of Ohio

Lead Counsel for Plaintiffs

Lindsay D. Barton (AL Bar No. 1165-G00N)
 Robert D. Tambling (AL Bar No. 6026-N67R)
 Assistant Attorneys General
 Office of the Alabama Attorney General
 501 Washington Avenue
 Montgomery, Alabama 36130
 Phone: (334) 353-2609 (Barton)
 (334) 242-7445 (Tambling)
 Fax: (334) 353-8400
Lindsay.Barton@AlabamaAG.gov
Robert.Tambling@AlabamaAG.gov
Attorneys for Plaintiff State of Alabama

Amanda Wentz (AR Bar No. 2021066)
 Assistant Attorney General
 Office of Attorney General Tim Griffin
 101 West Capitol Avenue
 Little Rock, AR 72201
 Phone: (501) 682-1178
 Fax: (501) 682-8118
amanda.wentz@arkansasag.gov
Attorney for Plaintiff State of Arkansas

Nicklas A. Akers (CA Bar No. 211222)
 Senior Assistant Attorney General
 Bernard A. Eskandari (CA Bar No. 244395)
 Supervising Deputy Attorney General
 Timothy D. Lundgren (CA Bar No. 254596)
 Rosailda Perez (CA Bar No. 284646)
 Deputy Attorneys General
 Office of the California Attorney General
 300 S. Spring St., Suite 1702
 Los Angeles, CA 90013
 Phone: (415) 510-3364 (Akers)
 (213) 269-6348 (Eskandari)
 (213) 269-6355 (Lundgren)
 (213) 269-6612 (Perez)
 Fax: (916) 731-2146
nicklas.akers@doj.ca.gov
bernard.eskandari@doj.ca.gov
timothy.lundgren@doj.ca.gov
rosailda.perez@doj.ca.gov
Attorneys for Plaintiff People of the State of California

Michel Singer Nelson (CO Bar No. 19779)
 Assistant Attorney General II
 Colorado Office of the Attorney General
 Ralph L. Carr Judicial Building
 1300 Broadway, 10th Floor
 Denver, CO 80203
 Phone: (720) 508-6220
michel.singernelson@coag.gov
*Attorney for Plaintiff State of Colorado,
 ex rel. Philip J. Weiser, Attorney General*

1 Brendan T. Flynn (Fed. Bar No. ct04545,
 2 CT Bar No. 419935)
 3 Assistant Attorney General
 4 Office of the Connecticut Attorney
 5 General William Tong
 6 165 Capitol Avenue, Suite 4000
 7 Hartford, CT 06106
 8 Phone: (860) 808-5400
 9 Fax: (860) 808-5593
 10 <mailto:brendan.flynn@ct.gov>
 11 *Attorney for Plaintiff State of Connecticut*

12 Ryan Costa (DE Bar No. 5325)
 13 Deputy Attorney General
 14 Delaware Department of Justice
 15 820 N. French Street, 5th Floor
 16 Wilmington, DE 19801
 17 Phone: (302) 683-8811
 18 Fax: (302) 577-6499
 19 Ryan.costa@delaware.gov
 20 *Attorney for Plaintiff State of Delaware*

21 Laura C. Beckerman (DC Bar No.
 22 1008120)
 23 Senior Trial Counsel
 24 Public Advocacy Division
 25 D.C. Office of the Attorney General
 26 400 6th Street NW, 10th Floor
 27 Washington, DC 20001
 28 Phone: (202) 655-7906
Laura.Beckerman@dc.gov
Attorney for Plaintiff District of Columbia

Sean P. Saval (FL Bar No. 96500)
 Sr. Assistant Attorney General
 Office of the Florida Attorney General
 Department of Legal Affairs
 Consumer Protection Division
 3507 E. Frontage Rd, Suite 325
 Tampa, FL 33607
 Phone: (813) 287-7950
 Fax: (813) 281-5515
Sean.Saval@myfloridalegal.com
*Attorney for Plaintiff James Uthmeier,
 Attorney General of the State of Florida*

David A. Zisook (GA Bar No. 310104)
 Senior Assistant Attorney General
 Office of the Georgia Attorney General
 40 Capitol Square SW
 Atlanta, GA 30334
 Phone: (404) 458-4294
 Fax: (404) 464-8212
dzisook@law.ga.gov
Attorney for Plaintiff State of Georgia

Christopher J.I. Leong (HI Bar No. 9662)
 Deputy Attorney General
 Hawaii Department of the Attorney
 General
 425 Queen Street
 Honolulu, HI 96813
 Phone: (808) 586-1180
 Fax: (808) 586-1205
christopher.ji.leong@hawaii.gov
Attorney for Plaintiff State of Hawaii

James J. Simeri (ID Bar No. 12332)
 Consumer Protection Division Chief
 Idaho Attorney General's Office
 P.O. Box 83720
 Boise, ID 83720-0010
 Phone: (208) 334-4114
james.simeri@ag.idaho.gov
Attorney for Plaintiff State of Idaho

Philip Heimlich (IL Bar No. 6286375)
 Assistant Attorney General
 Elizabeth Blackston (IL Bar No. 6228859)
 Consumer Fraud Bureau Chief
 Office of the Illinois Attorney General
 500 S. Second Street
 Springfield, IL 62791
 Phone: (217) 782-4436
philip.heimlich@ilag.gov
elizabeth.blackston@ilag.gov
Attorneys for Plaintiff People of the State of Illinois

Benjamin Bellus (IA Bar No. AT0000688)
 William Pearson (IA Bar No. AT0012070)
 Assistant Attorneys General
 Office of the Iowa Attorney General
 1305 E. Walnut St.
 Des Moines, IA 50319
 Phone: (515) 242-6536 (Bellus)
 (515) 242-6773 (Pearson)
 Fax: (515) 281-6771
Benjamin.Bellus@ag.iowa.gov
William.Pearson@ag.iowa.gov
Attorneys for Plaintiff State of Iowa

Nicholas C. Smith (KS Bar No. 29742)
 Sarah M. Dietz (KS Bar No. 27457)
 Assistant Attorneys General
 Consumer Protection Section
 Office of the Kansas Attorney General
 120 SW 10th Avenue, 2nd Floor
 Topeka, KS 66612
 Phone: (785) 296-3751
 Fax: (785) 291-3699
Nicholas.Smith@ag.ks.gov
sarah.dietz@ag.ks.gov
Attorneys for Plaintiff State of Kansas

Jacob P. Ford (KY Bar No. 95546)
 Assistant Attorney General
 Office of the Attorney General,
 Commonwealth of Kentucky
 1024 Capital Center Drive, Ste. 200
 Frankfort, KY 40601
 Phone: (502) 871-2044
jacobp.ford@ky.gov
Attorney for Plaintiff Commonwealth of Kentucky

ZaTabia N. Williams (LA Bar No. 36933)
 Assistant Attorney General
 Office of the Attorney General Liz Murrill
 1885 North Third St.
 Baton Rouge, LA 70802
 Phone: (225) 326-6164
 Fax: (225) 326-6499
WilliamsZ@ag.louisiana.gov
Attorney for Plaintiff State of Louisiana

Brendan O'Neil (ME Bar No. 009900)
 Michael Devine (ME Bar No. 005048)
 Assistant Attorneys General
 Office of the Maine Attorney General
 6 State House Station
 Augusta, ME 04333
 Phone: (207) 626-8800
 Fax: (207) 624-7730
brendan.oneil@maine.gov
michael.devine@maine.gov
Attorneys for Plaintiff State of Maine

Philip Ziperman (Fed. Bar No. 12430)
 Deputy Counsel
 Office of the Attorney General
 200 St. Paul Place
 Baltimore, MD 21202
 Phone: (410) 576-6417
 Fax: (410) 576-6566
pziperman@oag.state.md.us
Attorney for Plaintiff Maryland Office of the Attorney General

1 Carol Guerrero (MA Bar No. 705419)
 Assistant Attorney General
 2 Michael N. Turi (MA Bar No. 706205)
 Deputy Chief, Consumer Protection
 3 Division
 Massachusetts Office of the Attorney
 4 General
 One Ashburton Place, 18th Floor
 5 Boston, MA 02108
 Phone: (617) 963-2783
 6 Fax: (617) 727-5765
 7 <mailto:Carol.Guerrero@mass.gov>
 8 Michael.Turi@mass.gov
 9 *Attorneys for Plaintiff Commonwealth of*
 10 *Massachusetts*

11 Kathy P. Fitzgerald (MI Bar No. P31454)
 Michael S. Hill (MI Bar No. P73084)
 12 Assistant Attorneys General
 Michigan Department of Attorney General
 13 Corporate Oversight Division
 P.O. Box 30736
 14 Lansing, MI 48909
 Phone: (517) 335-7632
 15 Fax: (517) 335-6755
 16 fitzgeraldk@michigan.gov
 17 Hillm19@michigan.gov
 18 *Attorneys for Plaintiff People of the*
 19 *State of Michigan*

20 Bennett Hartz (MN Bar No. 0393136)
 Assistant Attorney General
 21 Office of the Minnesota Attorney General
 22 445 Minnesota Street, Suite 1200
 Saint Paul, MN 55404
 23 Phone: (651) 757-1235
 24 bennett.hartz@ag.state.mn.us
 25 *Attorney for Plaintiff State of Minnesota,*
 26 *by its Attorney General, Keith Ellison*

James M. Rankin (MS Bar No. 102332)
 Special Assistant Attorney General
 Mississippi Attorney General's Office
 P.O. Box 220
 Jackson, MS 39205
 Phone: (601) 359-4258
james.rankin@ago.ms.gov
Attorney for Plaintiff Lynn Fitch,
Attorney General State of Mississippi

Luke Hawley (MO Bar No. 73749)
 Assistant Attorney General
 Office of the Missouri Attorney General
 815 Olive Street, Suite 200
 St. Louis, MO 63101
 Phone: (314) 340-6816
 Fax: (314) 340-7891
luke.hawley@ago.mo.gov
Attorney for Plaintiff State of Missouri, ex.
rel. Andrew Bailey, Attorney General

Brent Mead (MT Bar No. 68035000)
 Deputy Solicitor General
 Anna Schneider (MT Bar No. 13963)
 Special Assistant Attorney General, Senior
 Counsel
 Montana Attorney General's Office
 Office of Consumer Protection
 215 North Sanders Street
 P.O. Box 200151
 Helena, MT 59620-0151
 Phone: (406) 444-4500
Brent.mead2@mt.gov
Anna.schneider@mt.gov
Attorneys for Plaintiff State of Montana

1 Gary E. Brollier (NE Bar No. 19785)
 2 Assistant Attorney General
 3 Office of the Attorney General Michael T.
 4 Hilgers
 5 2115 State Capitol Building
 6 Consumer Protection Division
 7 Lincoln, NE 68509
 8 Phone: (402) 471-1279
 9 Fax: (402) 471-4725
 10 gary.brollier@nebraska.gov
 11 *Attorney for Plaintiff State of Nebraska*

12 Michelle C. Badorine (NV Bar No. 13206)
 13 Senior Deputy Attorney General
 14 Office of the Nevada Attorney General
 15 Bureau of Consumer Protection
 16 100 North Carson Street
 17 Carson City, NV 89701-4717
 18 Phone: (775) 684-1164
 19 Fax: (775) 684-1299
 20 MBadorine@ag.nv.gov
 21 *Attorney for Plaintiff State of Nevada*

22 Mary F. Stewart (NH Bar No. 10067)
 23 Assistant Attorney General
 24 New Hampshire Department of Justice
 25 Office of the Attorney General
 26 Consumer Protection and Antitrust Bureau
 27 1 Granite Place South
 28 Concord, NH 03301
 Phone: (603) 271-1139
Mary.F.Stewart@doj.nh.gov
Attorney for Plaintiff State of New Hampshire

Blair Gerold (NJ Bar No. 294602019)
 Jeffrey Koziar (NJ Bar No. 015131999)
 Deputy Attorneys General
 New Jersey Office of the Attorney General
 Division of Law
 124 Halsey Street
 Newark, NJ 07101
 Phone: (609) 696-5363 (Gerold)
 (973) 648-7819 (Koziar)
 Fax: (973) 648-3879 (Gerold)
 (973) 648-4887 (Koziar)

Blair.Gerold@law.njoag.gov
Jeff.koziar@law.njoag.gov
Attorneys for Plaintiff State of New Jersey

Billy Jimenez (NM Bar No. 144627)
 Assistant Attorney General
 New Mexico Department of Justice
 408 Galisteo St.
 Santa Fe, New Mexico 87501
 Phone: (505) 527-2694
 Fax: (505) 490-4883
Bjimenez@nm DOJ.gov

Attorney for Plaintiff Raúl Torrez, New Mexico Attorney General

Glenna Goldis (NY Bar No. 4868600)
 Assistant Attorney General
 Office of the New York State Attorney
 General
 28 Liberty Street
 New York, NY 10005
 Phone: (646) 856-3697
Glenna.goldis@ag.ny.gov
*Attorney for Plaintiff Office of the Attorney
 General of the State of New York*

1 Elin S. Alm (ND Bar No. 05924)
 2 Christopher Glenn Lindblad (ND Bar
 3 No. 06480)
 4 Assistant Attorneys General
 5 Office of North Dakota Attorney General
 6 Consumer Protection & Antitrust Division
 7 1720 Burlington Drive, Suite C
 8 Bismarck, ND 58504-7736
 9 Phone: (701) 328-5570
 10 Fax: (701) 328-5568
 11 <mailto:ealm@nd.gov>
 12 clindblad@nd.gov

*Attorneys for Plaintiff State of North
 Dakota*

10 Sylvia Lanfair (OK Bar No. 30144)
 11 Assistant Attorney General
 12 Office of the Oklahoma Attorney General
 13 313 N.E. 21st St.
 14 Oklahoma City, OK 73105
 15 Phone: (405) 522- 8129
 16 Fax: (405) 522-0085
 17 <mailto:sylvia.lanfair@oag.ok.gov>
 18 *Attorney for Plaintiff State of Oklahoma ex
 rel. Attorney General Gentner Drummond*

18 Jordan M. Roberts (OR Bar No. 115010)
 19 Senior Assistant Attorney General
 20 Oregon Department of Justice
 21 Consumer Protection Division
 22 100 SW Market St.
 23 Portland, OR 97201
 24 Phone: (971) 673-1880
 25 Fax: (971) 673-1884
 26 jordan.m.roberts@doj.oregon.gov
 27 *Attorney for Plaintiff State of Oregon*

Mark W Wolfe (PA Bar No. 327807)
 Deputy Attorney General
 Pennsylvania Office of Attorney General
 Strawberry Square, 15th Floor
 Harrisburg, PA 17120-0001
 Phone: (717) 772-3558
 Fax: (717) 705-3795
mwolfe@attorneygeneral.gov
*Attorney for Plaintiff Commonwealth of
 Pennsylvania by Attorney General David
 W. Sunday, Jr.*

Stephen N. Provazza (RI Bar No. 10435)
 Special Assistant Attorney General
 Rhode Island Office of the Attorney
 General
 150 S. Main Street
 Providence, RI 02903
 Phone: (401) 274-4400, ext. 2476
 Fax: (401) 222-1766
sprovazza@riag.ri.gov
*Attorney for Plaintiff State of Rhode
 Island, by Attorney General Peter
 Neronha*

Kristin Simons (SC Bar No. 74004)
 Senior Assistant Attorney General
 South Carolina Attorney General's Office
 P.O. Box 11549
 Columbia, SC 29211-1549
 Phone: (803) 734-6134
ksimons@scag.gov
*Attorney for Plaintiff State of South
 Carolina*

Austin C. Ostiguy (TN Bar No. 040301)
 Tyler T. Corcoran (TN Bar No. 038887)
 Assistant Attorneys General
 Office of the Tennessee Attorney General
 P.O. Box 20207
 Nashville, TN 37202
 Phone: (615) 532-7271 (Ostiguy)
 (615) 770-1714 (Corcoran)
 Fax: (615) 532-2910

austin.ostiguy@ag.tn.gov
tyler.corcoran@ag.tn.gov
Attorneys for Plaintiff State of Tennessee

David Shatto (Fed. Bar No. 3725697; TX
 Bar No. 24104114)
 Assistant Attorney General
 Attorney General for the State of Texas
 Office of the Attorney General
 P.O. Box 12548 (MC-010)
 Austin, TX 78711
 Phone: (512) 463-2185
 Fax: (512) 473-9125

David.Shatto@oag.texas.gov
Attorney for Plaintiff State of Texas

Alexandra Butler (UT Bar No. 19238)
 Assistant Attorney General
 Utah Attorney General's Office
 160 East 300 South, 5th Floor
 P.O. Box 140872
 Salt Lake City, UT 84114-0872
 Phone: (385) 910-5533
 Fax: (801) 366-0315

alexandrabutler@agutah.gov
*Attorney for Plaintiff Utah Division of
 Consumer Protection*

James Layman (VT Bar No. 5236)
 Office of the Vermont Attorney General
 109 State Street
 Montpelier, VT 05609-1001
 Phone: (802) 828-2315
 Fax: (802) 304-1014
James.Layman@vermont.gov
Attorney for Plaintiff State of Vermont

Geoffrey L. Ward (VA Bar No. 89818)
 Senior Assistant Attorney General
 Office of the Attorney General of Virginia
 202 N. Ninth St.
 Richmond, VA 23219
 Phone: (804) 371-0871
 Fax: (804) 786-0122
gward@oag.state.va.us
*Attorney for Plaintiff Commonwealth of
 Virginia, ex rel. Jason S. Miyares,
 Attorney General*

Zorba Leslie (WA Bar No. 58523)
 Assistant Attorney General
 Washington State Attorney General's
 Office
 800 Fifth Avenue, Suite 2000
 Seattle, WA 98104
 Phone: (206) 340-6787
 Fax: (206) 464-6451
zorba.leslie@atg.wa.gov
Attorney for Plaintiff State of Washington

1 Ashley T. Wentz (WV Bar No. 13486)
2 Assistant Attorney General
3 West Virginia Attorney General's Office
4 Consumer Protection/Antitrust Division
5 P.O. Box 1789
6 Charleston, WV 25326
7 Phone: (304) 558-8986
8 Fax: (304) 558-0184
9 Ashley.T.Wentz@wvago.gov
10 *Attorney for Plaintiff State of West*
11 *Virginia ex rel. John B. McCuskey,*
12 *Attorney General*

Gregory A. Myszkowski (WI Bar No.
1050022)
Assistant Attorney General
Wisconsin Department of Justice
P.O. Box 7857
Madison, WI 53707-7857
Phone: (608) 266-7656
Fax: (608) 294-2907
gregory.myszkowski@wisdoj.gov
Attorney for Plaintiff State of Wisconsin

Cameron W. Geeting (WY Bar No.
7-5338)
Senior Assistant Attorney General
Consumer Protection and Antitrust Unit
Wyoming Office of the Attorney General
2320 Capitol Avenue
Cheyenne, Wyoming 82002
Phone: (307) 777-3795
cameron.geeting1@wyo.gov
Attorney for Plaintiff State of Wyoming

CERTIFICATE OF SERVICE

Pursuant to FEDERAL RULE OF CIVIL PROCEDURE 5(a), I hereby certify that on September 08, 2025, a true and correct copy of the above and foregoing document has been served using the CM/ECF system to all counsel and parties of record.

/s/ Belen O. Miranda